

EXHIBIT A

Declaration and Curriculum Vitae of Nusha Shishegar, Designated School Officer for 18 years

DECLARATION OF NUSHA SHISHEGAR

I, Nusha Shishegar, hereby declare under the penalty of perjury to the following:

- 1) I have served as a Primary Designated School Official (PDSO) for approximately 15 years and as a Designated School Official (DSO) for approximately 18 years.
- 2) All academic institutions certified by Immigration and Customs Enforcement's (ICE) Student Exchange Visitor Program (SEVP) to admit F-1/M-1 students into their programs are required to have at least one PDSO to communicate with SEVP and to ensure compliance with numerous student reporting requirements required by regulation¹ through SEVP's Student and Exchange Visitor Information System (SEVIS).²
- 3) I use SEVIS to monitor F-1 students and/or F-2 dependents who maintain their status.
- 4) Academic Institutions through PDSOs and Designated School Officials (DSO) are required to validate the SEVIS record of each student within 30 days of the start of every required academic term to confirm that someone is enrolled in a full course of study.
- 5) DSOs use SEVIS to update F-1/M-1 student addresses which are required to be reported by the principal holder within 10 days of moving to a new residence.
- 6) DSOs use SEVIS to approve or recommend an F-1 student for off-campus employment authorization, including Curricular Practical Training (CPT) or Optional Practical Training (OPT).
- 7) If a student transfers to another school, DSOs use SEVIS to send the student's record to another school for a new educational program.
- 8) DSOs use SEVIS to change the educational level if the student changes academic levels (such as when a student progresses from a bachelor's program to a graduate program) or majors within levels (such as an associates degree student who continues to a new associates degree program after graduation).
- 9) If a student fails to comply with the terms of her F-1/M-1 status, DSOs are required to terminate the student's SEVIS record.³
- 10) Termination of a student's SEVIS record ends all of the benefits of F-1/M-1 status, including but not limited to all on- and/or off-campus employment authorization such as CPT and OPT.
- 11) United States Citizenship and Immigration Services (USCIS) will also not approve an OPT employment authorization document (EAD) if a SEVIS record is terminated.

¹ <https://www.ice.gov/sevis/schools/reg#2143g>

² <https://studyinthestates.dhs.gov/2014/04/students-what-dso>; <https://www.ice.gov/sevis/dso-requirements>

³ <https://studyinthestates.dhs.gov/sevis-help-hub/student-records/completions-and-terminations/terminate-a-student>

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PERSONAL INFORMATION REDACTED

*Relevant Professional Experience*Senior Coordinator, International Student Programs

April 2019 - present

INSTITUTION REDACTED

- Serve as the District's primary immigration advisor and a Primary Designated School Official (DSO) with responsibility for maintaining compliance with federal regulations regarding admissions, monitoring, advising and reporting of roughly 500 F-1 visa students.
- Work with International Student Office Director to analyze data and develop new recruitment plans for emerging markets; work with campus partners and external agents to execute recruitment strategies
- Managed admissions pipeline, including processing applications, implementing the CCC Apply International module, working with recruitment partners, and enacting automated email campaigns
- Introduced new #ISO_CARES Month "intrusive counseling" appointment initiative with the goal of increasing retention, connecting students to just-in-time critical resources, and decreasing time-to-completion per student.
- Created office Instagram social media presence resulting in lead generation and increased student engagement
- Manage program's email inbox to inform prospective and current students of proper procedures for international student admissions, visa and legal status requirements, and District student services policies and procedures.
- Created brand new online Pre-Orientation program and re-designed orientation each year (both in person and virtually) to make the orientation program more engaging and enhance student learning outcomes.
- Re-designed office operations to respond to COVID-19 closure, including the introduction of online collaborative resource sharing through Google Suite, Microsoft Teams, and Zoom, engaging students through Zoom and Cranium Cafe's Online Counseling platform, and redesigning student worker responsibilities to allow them to work remotely; previously proactively requested training in online counseling module for myself and our program's academic counselors, fortuitously enabling the office to transition quickly during the pandemic.
- Create and manage programming (activities, workshops, and events) for international students and the campus community with an eye towards professional development, mental health, community involvement and integration, cultural exploration and knowledge, and diversity and inclusion, in addition to immigration regulations, registration requirements, and practices and procedures for maintaining student status.
- Successfully authored proposal to secure \$20,000 in Foundation Grant funding to create an international student emergency fund in response to COVID-19 for 2020-2021.
- Train and provide regular updates to other DSOs regarding immigration laws and practices affecting F-1 visa students; serve as an expert for other faculty and staff regarding international student programs and immigration laws and regulations impacting international students.
- Compile international student enrollment reports detailing demographic breakdowns and retention and transfer rates for Program Manager to aid in program assessment/review procedures.
- Serve as a resource member of International Students Committee and Placement & Assessment Committee, providing information on International Student Program policies and practices, immigration regulations, and issues impacting international students. Part of People Soft upgrade implementation team (2020 implementation).
- Overhauled the International Student Program website to increase student access to information and streamline their interactions with our office.
- Provide secondary-level supervision to 1 classified staff member, 4 academic counselors, and 3 student workers.

International Student Advisor

July 2016 – April 2019

Keck Graduate Institute

Claremont, CA

- Serve as Primary Designated School Official (PDSO) and Alternate Responsible Officer (ARO) in capacities dealing with immigration advising, processing, and reporting in the Student and Exchange Visitor Information System (SEVIS)
- Created and managed an international student program budget to triple the activities, workshops, and events for international students and the campus community with an eye towards professional development, mental health, community involvement and integration, cultural exploration and knowledge, and diversity and inclusion to meet department goals.
- Expanded international student orientation program to better address student needs surrounding acculturation, mental health, and campus services awareness.
- Coordinate with campus departments including Admissions, Student Services, Career Services, Alumni Affairs, and various academic deans and faculty to ensure student success.
- Serve as a highly-functional liaison with departments and divisions including International Place of the Claremont Colleges and other Claremont College Consortium resources, ensuring that prompt and accurate information is delivered in an effective, responsive manner with particular focus on student service.
- Serve as the first point of contact on complex immigration concerns, dealing with special situations involving international students ranging from immigration issues to personal concerns, emergencies, conflicts, and problems, in collaboration with the Dean of Student Engagement and Enrollment Services, Campus Safety, Director of Student Services, and other departments, as appropriate.
- Manage the implementation of the international student insurance program and act as point of contact on campus for international health insurance issues

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- Work collaboratively with the admissions team to communicate proactively with prospective international students and build upon conversion activities for admitted international students - i.e. admitted student webinars, "First Friends" mentor program, and the development of admitted student welcome packet.
- Overhauled website with user-friendly experience in mind; work to continuously improve value of webpages
- Assist students in obtaining F-1/J-1 immigration benefits such as CPT/OPT/STEM OPT extensions and Academic Training and in navigating the OMV, SSA, USCIS and other government agencies.

Immigration Student Support Specialist

September 2015 – June 2016

California State University, San Bernardino's College of Extended Learning
San Bernardino, CA

- As Primary Designated School Official (PDSO), managed immigration information in SEVIS for over 250 international students and ensured that school was in compliance with immigration regulations
 - Corresponded daily with students on a wide variety of issues (personal to academic to regulatory)
 - Modified several school practices surrounding transfers, vacation policies, and I-20 issuance length to bring us into compliance with immigration regulations
 - Submitted critical I-17 change in order to continue issuing I-20s as needed for school's programs prior to filing for recertification
- Introduced a number of initiatives to streamline office practices and better services provided to students:
 - Reduced paper use in office; moved billing and immigration record keeping to electronic format whenever possible
 - Created prospective and admitted student email campaigns for use in Salesforce
 - Created a current student reference guide to aid current students
 - Began website redesign project, including:
 - Reimaging format, content, and language used to make pages more inviting and user-friendly;
 - Proposing current students and immigration information pages be created; and
 - Working with marketing to arrange student focus groups to garner feedback on proposed pages
 - Worked on a formal admission packet to better guide international students on their transition to the US
 - Along with coworker, created proposals for an increased student activity calendar, student leadership club, and "friendly face" conversation partner program with an eye towards increasing student retention (proposed implementation Fall 2016)
- As primary purchaser for department, responsible for placing orders, paying invoices, and submitting procurement card reports

Supervisor of Traditional Undergraduate Admission Operations

April 2014 – September 2015

Supervisor of Graduate Admission Operations

November 2011 – April 2014

University of La Verne
La Verne, CA

- Effectively managed, developed, and improve data input processes within the Admissions Office, including the input of applications and admission decisions, and implementation of Recruiter CRM database
- Responsible for supervision and ongoing training of four full-time staff members and three student workers (Graduate; three full-time staff members and five student workers in Undergraduate):
 - Created a safe, creative, and fully-functional environment and engaged staff in the process of making necessary changes to office practices and setting goals resulting in an increase of productivity and morale, an elimination of processing backlogs, and reduced processing timeframes
 - Dramatically revised the use of interns to better serve the office, freeing staff to focus on the responsibilities of their position
- Responsible for complete overhaul of the acceptance and evaluation of international transcripts - including GPA calculations - to ensure that University received official, valid documentation and international applicants could be fairly reviewed
- Improved internal and external processes in a number of ways to better serve a multitude of constituents – prospective students, current applicants, admitted students, agents, Associate Directors of Admission (ADAs), and department chairs:
 - Implemented the use of strategic templates to allow the answering of emails in a timely fashion – response time fell from 3-4 days to same-day response within 2 weeks of implementation
 - Began running audit reports on a weekly basis to manage timelines, catch errors, ensure file completion, and follow up on outstanding admission decisions with departments/ADAs
 - Began the process of "incomplete application" reminder emails to better assist applicants in managing their applications prior to the implementation of BRM or Recruiter CRM tools – led to an increase of students completing or withdrawing their applications, thus providing ADAs with more accurate pools
 - Updated graduate web pages to increase information, ease navigation, and better guide applicants - especially international students - through the application process
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- Revised the conditional admission process in coordination with several on-campus constituents
- Created a formal admission packet to better guide admitted students to accept their offer of admission
- Greatly improved the university's relationship with agents by decreasing response time, and communicating changes in a timely manner
- Responsible for increased use of technology within the office
 - Key member of Recruiter CRM implementation team
 - Successfully implemented use of BDMS scanning software ahead of schedule requested by division – currently the only division within the Graduate sector of the University to be ready for a paperless process
 - Attended and contribute to all Enterprise Application User Group meetings; troubleshoot issues with OIT

Promoted to Assistant Director of Admissions & International Records

October 2008 – July 2011

Assistant Director of International Services

November 2005 to October 2008

Title change from Admissions & International Student Coordinator effective July 2007

Admissions & Records

Claremont Graduate University, Claremont, CA

- Led the Office of Admissions & Records in daily operations to include proper implementation of business procedures, improving processes in the office, when necessary, and planning, executing, and analyzing/measuring the office's endeavors and productivity
- Responsible for supervision and mentoring of 2 full-time staff members and 5 workstudy students
- Maintained regular contact with academic departments – including analyzing and/or providing informational reports – to ensure proper processing of applications within stated review timelines
- Managed immigration information in SEVIS and People Soft for over 350 international students to ensure that students retained F-1 & J-1 status and complied with immigration regulations while successfully fulfilling their academic requirements
- Corresponded daily via email, telephone, and in-person contact with prospective students and applicants to the university. Assisted current students with immigration and admissions needs
- Evaluated and tracked student documents both in the international and admissions realms. Engaged in frequent communication with students regarding the completion of their application dossiers or immigration files
- Served as primary liaison with departments on campus in the following capacities: information provider, problem solver, data researcher, solid communicator, procedural leader, trainer, and idea contributor
- Acted as primary contact with third party vendor for the online application and testing agencies for electronic test score reporting
- Oversaw insurance processing and acted as insurance liaison for all students
- Oversaw admissions webpages, and recently redesigned certain sections to ease navigation for the outside user
- All duties as listed below under the Assistant Director of International Services
- Sole contact for Consortium offices interested in inviting overseas professors, researchers, and exchange students/visitors.
- Created, updated, and oversaw communications being sent to prospective and current students from the admissions and international email inboxes
 - Implemented utilization of personalized templates to greatly reduce staff response time to emails and ensure that students felt as if their concerns/questions were being addressed in a timely manner
- Processed GMAT score and Apply Yourself data loads
- Created, manipulated and/or ran multiple Peoplesoft queries, using data to complete wide variety of tasks
- Processed and issued new I-20s, completed SEVIS transactions, including processing program changes, transferring students to/from institution, updating existing student records, and inactivating old student records
- Advised students individually and in group formats on the following issues: working while on student visa status, immigration requirements, transfer procedures, reinstatement procedures, on- and off-campus resources, and application procedures.
- Troubleshot problem records in SEVIS and other student databases; monitor deadlines and Alerts lists
- Presented immigration workshops at student orientations
- Managed website information for current and prospective international students
- Implemented system of email reminders to students with impending deadlines in order to help them maintain status
- Oversaw yearly Phi Beta Kappa scholarship

SEVIS Coordinator

October 2004 to November 2005

International Student Services (ISS)

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English and Certificate Programs for Internationals
UC Irvine, Extension, Irvine, CA

- Managed immigration information in VisaManager, SEVIS, and PowerCampus for over 1200 students a year
- Completed all SEVIS transactions and troubleshoot problem records within this and other student databases
- Implemented system of email/telephone reminders to students with impending deadlines in order to help them maintain status
- Trained new staff on office operations and business practices
- Processed applications in a variety and range of programs in a timely and efficient manner
- Advised students individually and in group formats on adjustment and immigration issues

Education

Masters of Business Administration (MBA)
California State University, San Bernardino
GPA: 3.975

June 2017

Bachelor of Arts
University of California Irvine, Irvine, CA
Degree: Psychology, Minor in Sociology
GPA: 3.628, Cum Laude

July 2005

College Governance Committees

Administrative Affairs, Member
Student Equity & Achievement Member

October 2021 to Present
March 2022 to Present

Union Involvement

CSEA Chapter 76 Secretary

January 2023 to Present

A complete list of professional associations, presentations and volunteer experience is attached.

Professional Memberships & Roles

NAFSA (National Association of International Educators) member

2005 - 2011; 2015 to present

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Stay abreast of current immigration trends, hot topics, and news. Participate in advocacy efforts and post to discussion forums to aid in advising colleagues across the country.

NAFSA Region XII Chair Stream (Chair-Elect, Chair, & Past Chair)

January 2023 – present

NAFSA Region XII (California, Nevada and Hawaii & the Pacific Islands) exists to recognize and support those in the field of international education through professional development opportunities, dissemination of information, and outreach activities. The Chair Stream is a three-year commitment, with the first year being Chair Elect, the second moving to Chair, and the third serving as Past Chair. The Chair stream conducts the business of Region XII including acting as a representative and liaison for its membership, managing a team of volunteers to execute the Region XII conference, and ensuring financial solvency of the region.

NAFSA Conference Committees

Responsible for managing different aspects of large-scale conference planning.

- 2022 NAFSA Region XII Conference, Sacramento: Conference Chair – responsible for Conference Budget
- 2021 NAFSA Region XII Conference, Virtual: Conference Apprentice
- 2020 NAFSA Region XII Conference, Virtual: Sessions Co-Chair
- 2019 NAFSA Region XII Conference, Pasadena: Sessions Co-Chair
- 2019 NAFSA Region XII Southern District Mini Conference, Virtual: Sessions Chair
- 2018 NAFSA Region XII Southern District Mini Conference, Orange Coast College: Conference Chair – responsible for Conference Budget
- 2017 NAFSA Annual Conference Committee, Los Angeles: Logistics Co-Chair

NAFSA Region XII Student Regulatory Ombudsman

January 2019 - December 2020

The role of the Regulatory Ombudsperson (aka RegBud) is to help provide regulatory advice on practice issues to the Region XII international student advisers, plan and coordinate the regional conference government sessions, and serve as the Region XII liaison with offices of USCIS, DHS, DOS, and other federal government divisions.

NAFSA Region XII Southern District Chair Stream (Chair-Elect, Chair, & Past Chair)

March 2017 – December 2019

The Southern District exists to recognize and support those in the Southern California District who are engaged or interested in the international educational exchange of students and scholars through professional development opportunities, dissemination of information, and outreach activities. The Chair Elect position is a three year commitment (1st year - Chair Elect, 2nd year - Chair, 3rd year - Past Chair). In addition to acting as a representative and liaison for its membership, the Chair conducts the business of the Southern California District and attends Regional Leadership Team meetings.

NAFSA International Student and Scholar Regulatory Practice (ISS RP) Committee, Travel Subcommittee member

March 2017 – December 2019

The International Student and Scholar Regulatory Practice Committee (ISS RP) is charged with identifying regulatory practice issues that need action through government agency liaison by NAFSA staff, or team members as requested by staff. ISS RP also identifies practice resources to be referred to the Knowledge Community for International Student and Scholar Services (KC ISSS) for development. The committee assists the NAFSA's Vice President for Public Policy and Practice (VPPPP) in communicating to members on regulatory practice issues and identifies longer term public policy issues and forwards those to the VPPPP.

NAFSA Trainer Corps Member

February 2017 - present

The NAFSA Trainer Corps is made up of approximately 300 member volunteers who develop and maintain the NAFSA Core Education Program (CEP) curriculum and materials. Trainer responsibilities are to deliver trainings at various events, programs, meetings, and conferences throughout the year, including NAFSA's Annual Conference, Regional Conferences, and on-site offerings all over the country. I specialize in training the F-1 for Beginners and F-1 Intermediate workshops.

LA PIER (Los Angeles Professional International Educators Roundtable) member

2011 - present

Connect with colleagues outside of official NAFSA gatherings to focus on a variety of F-1 and J-1 student issues and immigration hot topics. Provide advising to other DSOs/ROs on a variety of topics shared through email forum. Presentations at LA PIER include:

- *Surviving Advising during the Coronavirus Crisis*, Spring 2020
- *Immigration Nightmares*, Spring 2018
- *Going Paperless*, Winter 2017
- *Transfers – Rethinking the Transfer Form*, Winter 2016

LA PIER SEVP Update Coordinator

January 2017 - December 2018

LA PIER provides Southern California international educators with an opportunity to connect with colleagues. In addition to hosting an e-mail forum, where members can pose advising/regulatory questions to one another and gather information on best practices and immigration trends, the group meets four times a year at different campus locations around and within Los Angeles, Orange, Ventura, and San Bernardino Counties. About 60-80 people attend these meetings to focus on a variety of F-1 and J-1 student issues. Hot topics, immigration updates, and group

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discussions are regular components of the agenda. SEVP Update Coordinator duties are to attend and summarize content from online webinars led by SEVP, USCIS, NAFSA, and other regulatory update bodies. Continue to provide immigration expertise, advising, and mentorship for DSOs/ROs at a multitude of schools across Southern California, and attend all LA PIER Team meetings.

LA PIER Coordinator

October 2015 - December 2016

Manage the LA PIER list-serve, organized and collaborated with the LA PIER leadership team, and acted as a liaison between the LA PIER community and other organizations (i.e. SEVP Field Reps and NAFSA). Provided immigration expertise, advising, and mentorship for DSOs/ROs at a multitude of schools across Southern California.

Presentations, Workshops, & Events

NAFSA Region XII Conference, Sacramento: Presenter

October 2024

Behind the Consular Curtain, co-presented with immigration attorneys David Strashnoy, David Ware & Avi Friedman
ListServe Live!, co-presented with Mei Cooley

EdUSA, Virtual: Presenter

October 2023

Information About California Community Colleges, co-presented with Courtney Sutton and Mary Watts

NAFSA Region XII Conference, Hawaii: Presenter

October 2023

Behind the Consular Curtain, co-presented with immigration attorneys David Strashnoy, David Ware & Avi Friedman
Listserve Live!, co-presented with Matthew Loehrer
Is it Though?: Determining When Best Practices No Longer Are, co-presented with Erik Williams
NAFSA Core Educational Program (CEP): *F-1 Student Advising for Beginners*, Lead Trainer

NAFSA Annual Conference, Washington DC: Presenter

April 2023

Ch-Ch-Changes!: Time to Make a Change (for our Students) co-presented with Matthew Loehrer, University of San Francisco

NAFSA Region XII Conference, Sacramento: Presenter

November 2022

Behind the Consular Curtain, co-presented with immigration attorneys David Strashnoy, David Ware & Avi Friedman
ListServe Live!, co-presented with Region XII Scholar Regulatory Ombudsman, Erik Williams
Ch-Ch-Changes!: Time to Make a Change (for our Students) co-presented with Matthew Loehrer, University of San Francisco

NAFSA Annual Conference, Denver: Presenter

April 2022

Behind the Consular Curtain, co-presented with immigration attorneys David Strashnoy, David Ware & Avi Friedman
ListServe Live!, co-presented with Region XII Scholar Regulatory Ombudsman, Erik Williams
OPT Master Class, co-presented with Joshua Davis (Portland State Univ.) and Sarah Brockmeyer (Santa Clara University)

NAFSA Southern District, Virtual Conference: Presenter

August 2021

Listserve Live!, co-presented with Erik Williams, Region XII Regbud

EdUSA Forum 2021, Virtual: Presenter

July 2021

Commitment, Communication, Composure: Success Strategies for Advisers, co-presented with Loveness Schafer (Louisiana State Univ.) and Roopa Rajwee (Northeastern Univ)

NAFSA 2021 Annual Conference, Virtual: Presenter

June 2021

Listserve Live!, co-presented with Sara Johnson (North Dakota State Univ.) and Joshua Whitson (Oberlin College)
OPT Master Class, co-presented with Joshua Davis (Portland State Univ.) and Michelle Massey (Univ. of Maryland, Baltimore County)

LA County Bar Association: Lunch With the Experts on F1/J1

May 2021

Co-presented with immigration attorney Adam Green

NAFSA: Online OPT Filing Roundtable

May 2021

Co-presented with Erik Williams, Sara Brockmeyer & Sharon Ericsson from NAFSA Region XII

NAFSA Region XII Conference, Virtual: Presenter

October 2020

Behind the Consular Curtain, co-presented with immigration attorneys David Strashnoy, David Ware & Avi Friedman
Regulatory Updates & ListServe Live!, co-presented with Region XII Scholar Regulatory Ombudsman, Kelly Zuniga

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Health and Wellness for International Students, EducationUSA

July 2020

Co-presented with Roopa Rajwee & Elena Barrios at invitation of EducationUSA, Mexico

Navigating Pandemic-related Visa & Other Immigration Challenges Faced by International Students and Postdoctoral Scholars

June 2020

Co-presented with immigration attorney Brendan Delaney at invitation of the American Psychological Association

NAFSA Region XII Conference, Virtual: Presenter

April 2020

Behind the Consular Curtain, co-presented with immigration attorneys David Strashnoy, David Ware & Avi Friedman

NAFSA Region XII Conference, Pasadena: Presenter

November 2019

Rethinking Your Advising In Times of Constant Change, co-presented with immigration attorney Adam Green

Behind the Consular Curtain, co-presented with immigration attorneys David Strashnoy, David Ware & Avi Friedman

Simplify Your DSO Life, co-presented with Massey Pierce, DSO at Loyola Marymount University

ListServe Live!, co-presented with Region XII Scholar Regulatory Ombudsman, Matthew Loehrer

Chair/co-chair of 5 governmental update sessions, co-presenting with various representatives from government agencies: Student & Exchange Visitor Program (2 sessions), Customs & Border Protection, US Department of State, & US Citizenship & Immigration Services.

American Immigration Lawyers Association presentation: *Important Considerations when Hiring F-1 Students*

February 21, 2019

Panel presentation with Adam Green of Law Offices of Adam Green, and Jordi Bayer of Fragomen, Del Rey, Bernsen & Lowey LLP, on CPT, OPT, STEM OPT, and H1-B considerations for F-1 students. Discussion also included reinstatements and unlawful presence.

NAFSA Region XII Conference, Reno: Presenter

October 2018

Rethinking Your Advising In Times of Constant Change, co-presented with Adam Green of Law Offices of Adam Green, and Ashley Browne, scholar advisor at UC Irvine

Behind the Consular Curtain, co-presented with David Strashnoy of Stone Grzegorek and Gonzalez, LLP

Region XII Southern District Mini Conference: Presenter

July 27, 2018

Immigration Nightmares, co-presented with Adam Green of Law Offices of Adam Green

Behind the Consular Curtain, co-presented with David Strashnoy of Stone Grzegorek and Gonzalez, LLP

NAFSA Region XII Regional Conference: Hawaii

October 2008

Keys to Successful International Orientations, co-presented with Paul Yunouye

Additional Volunteer Experience

Regional Lead Volunteer, American Cancer Society LA East Division

June 2013 – June 2014

Help to manage, motivate, and troubleshoot 24 Relay For Life events in the Los Angeles (East) region responsible for raising a projected \$874,000. Mentor and provide training to Event Chairs on a continual basis. Meet with key American Cancer Society staff to develop strategies for increased engagement and fundraising within the region.

American Cancer Society, Volunteer

City of Claremont/La Verne's Relay For Life, Logistics Chair

2013 - 2014

2014 Logistics Co-Chair: Oversee all aspects of event production including coordinating with key host site personnel and volunteers throughout the year. Actively mentor the two new Event Co-Chairs.

City of Claremont/La Verne's Relay For Life Event Chair, 2012 & 2013

2011 - 2013

Oversee all aspects of implementation for 2012 & 2013 Relay For Life events including team development, budget management, and training. The events raised over \$140 thousand for American Cancer Society.

American Cancer Society, Volunteer

City of Claremont's Relay For Life 2010 Online Chair; 2011 Online Chair & Team Captain Coordinator

2009 - 2011

Managed website during Relay months, respond to user concerns, and provide training. Managed, worked with, and inspired all teams and ran all Team Captain workshops

American Cancer Society, Volunteer

City of Claremont's Relay For Life Event Chair, 2008 & 2009

2007 - 2009

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Oversaw all aspects of implementation for 2008 & 2009 Relay For Life events including team development, budget management, and training; the events raised over \$120 thousand for American Cancer Society
American Cancer Society, Volunteer

Co-Presenter: Event Development

February 2009

Relay U 2009

Relay For Life Training Workshop

American Cancer Society, Volunteer

Co-Presenter: Keys to Successful International Orientations

October 2008

National Association of Foreign Student Advisors (NAFSA) Regional Conference

Workshop Content Developer

July - August 2008

Developed 3 workshops for presentation at Relay University trainings across all 9 California Relay For Life districts

Workshops Titles: ABC's of Fundraising; Production - What Every Relay Needs-Safety, A Message, and Stuff!; and Making the ASK

American Cancer Society, Volunteer

- 12) USCIS will consider a terminated record as a lack of status or failure to maintain status for the student, which renders the student out of status.⁴
- 13) After a student's SEVIS record is terminated, SEVP advises that the student must either apply for reinstatement or the student and dependents must leave the United States immediately.⁵
- 14) If a student fails to maintain F-1/M-1 status, the DSO can recommend the student for reinstatement on SEVIS Form I-20.⁶
- 15) DSOs cannot recommend students for reinstatement if they have not failed to maintain F-1/M-1 status and are instead maintaining F-1/M-1 status as confirmed by SEVP through an active SEVIS record.
- 16) The Department of Homeland Security (DHS), through ICE and United States Customs and Border Protection (CBP), have always considered a SEVIS termination as termination of F-1/M-1 lawful status in the United States.
- 17) The U.S. Department of State (DOS) will not issue an F-1/M-1 visa to a student based upon a terminated SEVIS record.
- 18) CBP will not admit an F-1/M-1 student into the United States on a terminated SEVIS record.⁷
- 19) I am familiar with the thousands of SEVIS terminations ICE initiated in March and April 2025.
- 20) I am familiar with the notices that advised DSOs that students with terminated SEVIS records had to leave the United States.
- 21) DSOs have contacted the SEVP Response Center (SRC) to request a correction of the terminated SEVIS records and SRC has indicated that the record is not eligible for a "data fix" or correction.
- 22) I have read and considered the sworn testimony of Andre Watson, Assistant Director, National Security Division, Homeland Security Investigation, U.S. Immigration and Customs Enforcement, U.S. Department of Homeland Security.
- 23) In particular, I have read and considered the statement from Mr. Watson that "Terminating a record in SEVIS does not terminate an individual's nonimmigrant status in the United States."
- 24) In my experience, ICE has always taken the opposite position that terminating a record in SEVIS does result in the termination of an F-1/M-1 student's nonimmigrant status in the United States.
- 25) The position of Mr. Watson is different than the public position of ICE and all previous statements and guidance I received during my career.

⁴ 8 CFR 214.2(f)(16), 8 CFR 214.2(f)(6)(iii), 8 CFR 214.2(f)(7)(iii) and 8 CFR 214.3(g)(1).

⁵ <https://studyinthestates.dhs.gov/sevis-help-hub/student-records/completions-and-terminations/terminate-a-student>

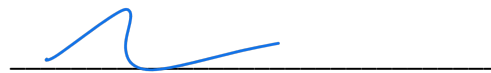
⁶ <https://studyinthestates.dhs.gov/2016/07/how-should-f-or-m-student-file-reinstatement>

⁷ <https://studyinthestates.dhs.gov/sevis-help-hub/student-records/completions-and-terminations/terminate-a-student>

- 26) The position of Mr. Watson is also discordant with language found in the regulations at 8 CFR 214.2(f) and 8 CFR 214.3(g).
- 27) A termination of the SEVIS record would naturally terminate a student's F-1/M-1 status and cut off any ability for the student to maintain F-1/M-1 status absent being approved by the USCIS for reinstatement after the USCIS accepts the student's reason for the status violation.
- 28) Additionally, the F-1/M-1 student would not be eligible for reinstatement if according to the position of Mr. Watson that SEVIS termination does not affect F-1/M-1 status because reinstatement is only available if the student has violated status.
- 29) Furthermore, ICE has notified F-1 students with OPT Employment Authorization Documents (EAD) through the SEVP Portal that their OPT authorization has summarily ended which would not occur if, according to the position of Mr. Watson, that SEVIS termination does not affect F-1 status.⁸
- 30) Moreover, a termination of SEVIS records disallows any student (especially students on CPT or OPT) to continue maintaining status because such students need an active SEVIS record to meet regulatory program reporting requirements.⁹
- 31) ICE indicates that "For DHS to fulfill [its national security] mission, the information contained within SEVIS and the portal must be accurate, complete and up to date. Inaccurate information jeopardizes an international student's ability to legally remain in the United States."¹⁰
- 32) Students with a terminated SEVIS record are left with no options: they will not be able to timely meet ICE's numerous reporting requirements through SEVIS which would otherwise be a requirement to maintain lawful status.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 21st day of April 2025.



Nusha Shishegar

⁸ <https://www.uscis.gov/policy-manual/volume-2-part-f-chapter-5> (USCIS Policy Manual stating that failure to maintain status is one of the few reasons for automatic termination of OPT). Also 8 CFR 214.2(f)(9)(ii)(A) (employment authorization is automatically terminated whenever the student fails to maintain status)

⁹ <https://studyinthestates.dhs.gov/sevp-portal-help/maintain-information/opt-student-reporting-requirements>;
<https://studyinthestates.dhs.gov/assets/sevpstemoptreportingrequirementsfinal.pdf>

¹⁰ <https://studyinthestates.dhs.gov/sevp-portal-help/maintain-information/opt-student-reporting-requirements>